

IN THE UNITED STATE BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

IN RE:)	Case No. 09-15489-SSM
)	Chapter 7
FARAH MOLIERE THOMAS)	
DAMON FLETCHER THOMAS)	
)	
Debtors)	
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)	
WELLS FARGO BANK, N.A.)	
c/o GMAC MORTGAGE LLC)	
)	
Movant)	
vs.)	
)	
FARAH MOLIERE THOMAS)	
DAMON FLETCHER THOMAS)	
)	
Debtors/Respondents)	
)	
and)	
DONALD F. KING)	
Trustee/Respondent)	

DEBTORS' RESPONSES TO MOTION
FOR RELIEF FROM THE AUTOMATIC STAY

Debtors, Farah Moliere Thomas and Damon Fletcher Thomas ("Debtors"), by and through counsel, respond to the Wells Fargo Bank, National Association c/o GMAC Mortgage LLC's Motion for Relief from the Automatic Stay ("Motion") as follows:

1. The Debtors admit allegations contained in paragraph nos. 1 through 10.

2. The Debtors have no knowledge to admit or deny the allegations contained in paragraph no. 11 of the Motion and deny the same.

3. The Debtors deny the allegation contained in paragraph no. 12 of the Motion.

AFFIRMATIVE DEFENSE

The Debtors contend that it would be inequitable to allow the Movant to be granted its Motion at this time. A new employment opportunity that will allow the Debtors to repay the Movant is a strong possibility, which would allow the Debtors and their two young children to remain in the Property.

Respectfully Submitted,
Pesner Kawamoto Conway, PLC

/s/ Martin C. Conway
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Counsel for Debtors

CERTIFICATE OF SERVICE

I certify that on this 5th day of August, 2009, the following person(s) were served electronically via the C&ECF system or were mailed a copy of the foregoing Response by first class mail postage prepaid, to:

Donald F. King, Trustee
9302 Lee Highway, Suite 1100
Fairfax, VA 22031

Stephen B. Wood
4520 East West Highway, Suite 200
Bethesda, MD 20814

/s/ Martin C. Conway
Martin C. Conway

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